

SEALED

FILED

DEC 16 2024

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

Heidi D. Campbell, Clerk  
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Case No.

24 CR - 391 GKF

Plaintiff,

FILED UNDER SEAL

v.

INDICTMENT

MONICA J. THOMPSON,  
a/k/a "Monica Jill Crane,"  
a/k/a "Monica Jill Thompson,"  
a/k/a "Jill Davis,"  
JOSEPH LEE STARKEY,  
a/k/a "Kane,"

[COUNTS ONE and TWO: 18  
U.S.C. § 1349 – Conspiracy to  
Commit Wire Fraud and Mail  
Fraud;  
COUNT THREE: 18 U.S.C. § 371 –  
Conspiracy to Use False Writing;  
COUNTS FOUR through TEN: 18  
U.S.C. § 1028A(a)(1) – Aggravated  
Identity Theft;  
Forfeiture Allegation: 18 U.S.C.  
§§ 981(a)(1)(C), 982(a)(2), and  
1028(b), and 28 U.S.C. § 2461 –  
Fraud Forfeiture]

Defendants.

THE GRAND JURY CHARGES:

COUNTS ONE and TWO  
[18 U.S.C. § 1349]

The Conspiracy and its Object

1. From on or about April 28, 2023, through the date of this Indictment, the defendants, **MONICA J. THOMPSON**, a/k/a "Monica Jill Crane," a/k/a "Monica Jill Thompson," a/k/a "Jill Davis," and **JOSEPH LEE STARKEY**, a/k/a "Kane," and other persons known and unknown to the Grand Jury, knowingly conspired to commit a fraud crime listed in United States Code, Title 18, Chapter 63, namely: Wire Fraud in violation of Title 18, United States Code, Section 1343; and

Mail Fraud in violation of Title 18, United States Code, Section 1341, in the following manner:

**The Purpose of the Conspiracy**

2. The purpose of the Conspiracy was to enrich **THOMPSON** and **STARKEY** by defrauding Otis Wayne Crane, a disabled United States Army veteran, by arranging a sham marriage between defendant **THOMPSON** and Crane, then taking and attempting to take Crane's United States Department of Veterans Affairs ("VA") disability benefits by various means to deceive and attempt to deceive Crane and the VA into paying Crane's VA disability benefits to **THOMPSON**, (the "Conspiracy"), some or all of which proceeds were then split and used mutually by **THOMPSON** and **STARKEY**.

**The Manner and Means of the Conspiracy**

3. **THOMPSON** and **STARKEY** used the following manner and means, among others, to achieve the object of the Conspiracy:

4. It was part of the Conspiracy that Crane was a retired military veteran entitled to receive various benefits. Specifically, Crane was a veteran of the United States Army who served on active duty between 1974 and 1975. He had a 70% service-connected disability rating from the VA, and he was entitled to receive monthly disability benefits and additional benefits such as an annual clothing allowance. Crane passed away on August 11, 2024.

5. It was part of the Conspiracy that Crane was physically and emotionally vulnerable. Specifically, by May of 2023, Crane had severe depression and a history of PTSD, traumatic brain injury, depressive disorder, and bipolar disorder. He also had limited literacy and computer skills.

6. It was part of the Conspiracy that Crane and **THOMPSON** had known each other for several years and that **THOMPSON** knew that Crane desired a romantic relationship with **THOMPSON**.

7. It was part of the Conspiracy, however, that **THOMPSON** and **STARKEY** had been in a romantic relationship for several years, and they continued this romantic relationship before and during the Conspiracy. **THOMPSON** and **STARKEY** publicly referred to each other as husband and wife during the time the conspiracy was ongoing, as did others.

8. It was part of the Conspiracy that, on or about April 28, 2023, **THOMPSON** and Crane both signed an application for a Marriage License from the Court Clerk of Tulsa County, Oklahoma.

9. It was part of the Conspiracy that, the next day, April 29, 2023, **STARKEY** certified that he held the required credentials or authority to solemnize a marriage between Crane and **THOMPSON**, as Minister 1096200 of the Universal Life Church, and that he had joined Crane and **THOMPSON** in marriage on that date. This was false. In fact, on April 29, 2023, **STARKEY** did not hold the required credentials to solemnize a marriage under Oklahoma law.

10. It was part of the Conspiracy that Crane attempted suicide on or about September 7, 2023. The next day he was transported to the VA hospital in Oklahoma City, Oklahoma, where he was placed into a suicide watch ward. On or about September 21, 2023, the VA determined that Crane's disability prevented him from managing his affairs. Crane remained at the VA hospital in Oklahoma City until on or about March 15, 2024, when he was transferred to the Lawton Fort Sill Veteran Center.

### **The Execution of the Conspiracy**

11. It was part of the Conspiracy that **THOMPSON**, with the intent to defraud, devised and willfully participated in, with knowledge of its fraudulent nature, the above-described Conspiracy and artifice to defraud and obtain money and property by materially false and fraudulent pretenses, representations, and promises and made numerous communications and contacts to and with the VA by both means of electronic communications and/or mail to obtain and attempt to obtain the VA benefits due to Crane. It was also part of the Conspiracy that **THOMPSON** and **STARKEY** shared some or all of the proceeds obtained through the Conspiracy.

12. On or about the dates stated in the chart below, in the Northern District of Oklahoma, **THOMPSON**, acting in furtherance of the Conspiracy, knowingly executed, and attempted to execute, the Conspiracy by causing the following interstate wire communications to the VA:

<b>Count</b>	<b>Date(s)</b>	<b>Communication</b>
1	5/25/2023	VA Application to add dependents purportedly electronically signed by Crane.
1	9/12/2023	VA Direct Deposit Enrollment form purportedly electronically signed by Crane.
1	10/6/2023	VA.gov IP login showing ID.me electronic remote access to Crane's online account changing direct deposit to JP Morgan Chase Account owned and controlled by <b>THOMPSON</b> .
1	1/13/2024	VA Authorization to Disclose form purportedly electronically signed by Crane.
1	1/13/2024	VA Direct Deposit Enrollment Change purportedly electronically signed by Crane.

13. On or about the dates stated in the chart below, in the Northern District of Oklahoma, for the purpose of executing and attempting to execute the above-described Conspiracy and artifice to defraud, **THOMPSON** knowingly caused to be delivered by mail to the VA through the United States Postal Service the following matter:

<b>Count</b>	<b>Date(s)</b>	<b>Mail Matter</b>
2	9/10/2023 – 9/18/2023	VA Authorization to Disclose Personal information purportedly signed by Crane.
2	9/10/2023 – 9/21/2023	VA Direct Deposit Enrollment form purportedly signed by Crane.

All in violation of Title 18, United States Code, Section 1349.

**COUNT THREE**  
**[18 U.S.C. § 371]**

14. The allegations of Counts One and Two of this Indictment are incorporated in this Count by reference.

15. On or about the dates listed in the table below, the defendants, **MONICA J. THOMPSON**, a/k/a “Monica Jill Crane,” a/k/a “Monica Jill Thompson,” a/k/a “Jill Davis,” and **JOSEPH LEE STARKEY**, a/k/a “Kane,” in furtherance of the Scheme and for the purpose and in the manner set forth in the allegations of Counts One and Two of this Indictment, in a matter within the jurisdiction of the executive branch of the United States Government, knowingly and willfully agreed and conspired to make and use false writings and documents knowing the same to contain materially false, fictitious, and fraudulent statements and entries, in the following manner: **THOMPSON** caused to be submitted to the VA, a department of the United States government, forged forms set forth in such table, which contained electronic and hand-written signatures purporting to be that of Crane, when, in fact, they were not:

<b>Date(s)</b>	<b>Communication</b>
5/25/2023	VA Application to add dependents purportedly electronically signed by Crane.
9/12/2023	VA Direct Deposit Enrollment form purportedly electronically signed by Crane.
1/11/2024 – 1/13/2024	VA Authorization to Disclose form purportedly electronically signed by Crane.
1/13/2024	VA Direct Deposit Enrollment Change purportedly electronically signed by Crane.
9/10/2023 – 9/18/2023	VA Authorization to Disclose Personal information purportedly signed by Crane.
9/10/2023 – 9/21/2023	VA Direct Deposit Enrollment form purportedly signed by Crane.

All in violation of Title 18, United States Code, Section 371.



**COUNTS FOUR through TEN**  
**[18 U.S.C. § 1028A(a)(1)]**

16. The allegations of Counts One through Three of this Indictment are incorporated in these Counts by reference.

17. On or about the dates stated below, in the Northern District of Oklahoma and elsewhere, the defendants, **MONICA J. THOMPSON**, a/k/a “Monica Jill Crane,” a/k/a “Monica Jill Thompson,” a/k/a “Jill Davis,” and **JOSEPH LEE STARKEY**, a/k/a “Kane,” in furtherance of the Scheme and for the purpose and in the manner set forth in the allegations of Counts One and Two of this Indictment, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely, Conspiracy to Commit Wire Fraud and Conspiracy to Commit Mail Fraud, in violation of Title 18, United States Code, Section 1349, knowingly transferred, possessed, and used, without lawful authority, a means of identification belonging to another person, namely Otis Crane, knowing that the means of identification belonged to Crane. The means of identification included personally identifiable login information and the electronic and hand-written signatures of Crane used in connection with the forms set forth below:

<b>Count</b>	<b>Date(s)</b>	<b>Communication</b>
4	5/25/2023	VA Application to add dependents purportedly electronically signed by Crane.
5	9/12/2023	VA Direct Deposit Enrollment form purportedly electronically signed by Crane.
6	10/6/2023	VA.gov IP login showing ID.me electronic remote access to Crane's on-line account changing direct deposit.
7	1/11/2024 – 1/13/2024	VA Authorization to Disclose form purportedly electronically signed by Crane.
8	1/13/2024	VA Direct Deposit Enrollment Change purportedly electronically signed by Crane.
9	9/10/2023 – 9/18/2023	VA Authorization to Disclose Personal information purportedly signed by Crane.
10	9/10/2023 – 9/21/2023	VA Direct Deposit Enrollment form purportedly signed by Crane.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

**FORFEITURE ALLEGATION**

**[18 U.S.C. §§ 981(a)(1)(C), 982(a)(2), 1028(b), and 28 U.S.C. § 2461]**

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2), and 1028(b), and Title 28, United States Code, Section 2461.

Upon conviction of the offenses alleged in this Indictment, as a part of each of their respective sentences, the defendants, **MONICA J. THOMPSON**, a/k/a “Monica Jill Crane,” a/k/a “Monica Jill Thompson,” a/k/a “Jill Davis,” **and JOSEPH LEE STARKEY**, a/k/a “Kane,” shall forfeit to the United States, any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violations, and any property, real or personal, that was used or intended to be used to commit or to facilitate the violation of federal law. The property to be forfeited includes, but is not limited to:

**MONEY JUDGMENT**

A money judgment in an amount of at least \$29,440.39, representing proceeds obtained by the Defendants as a result of the offenses.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c), the defendants shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendants, the property described above, or any portion thereof, cannot be located upon the exercise

of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2), and 1028(b), and Title 28, United States Code, Section 2461.

CLINTON J. JOHNSON  
United States Attorney

A TRUE BILL

  
\_\_\_\_\_  
CHARLES GREENOUGH  
Assistant United States Attorney

/s/ Grand Jury Foreperson  
Grand Jury Foreperson

AO 442 (Rev. 10/13) Arrest Warrant

SEALED

## UNITED STATES DISTRICT COURT

for the  
Northern District of Oklahoma

RECEIVED

DEC 17 2024

United States of America  
v.JOSEPH LEE STARKEY,  
a/k/a "Kane,"  
DefendantBY: USMS  
Case No. 24 CR - 391 GKF  
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## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay  
(name of person to be arrested) JOSEPH LEE STARKEY, a/k/a Kane  
who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment   ☐ Superseding Indictment   ☐ Information   ☐ Superseding Information   ☐ Complaint  
☐ Probation Violation Petition   ☐ Supervised Release Violation Petition   ☐ Violation Notice   ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 1349 Conspiracy to Commit Wire Fraud and Mail Fraud  
18 U.S.C. § 371 – Conspiracy to Use False Writing  
18 U.S.C. § 1028A(a)(1) – Aggravated Identify Theft  
18 U.S.C. §§ 982(a)(2)(B) and 1028(b) – Fraud Forfeiture

Date: DEC 16 2024  
Issuing officer's signatureCity and state: Tulsa, OklahomaHeidi D. Campbell, Court Clerk  
Printed name and title

## Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_

At (city and state) \_\_\_\_\_

Date: \_\_\_\_\_

\_\_\_\_\_  
Arresting officer's signature\_\_\_\_\_  
Printed name and title